

**THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANGELA BROWN, *et al.*

Case No.: 1:22-cv-01455-KPF

Plaintiffs,

**COLLECTIVE ACTION**

v.

**PLAINTIFF KAYLA URENA’S  
NOTICE OF ACCEPTANCE OF  
DEFENDANTS’ OFFER OF  
JUDGMENT PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 68**

PEREGRINE ENTERPRISES, INC.  
dba RICK’S CABARET NEW  
YORK, a New York corporation; RCI  
ENTERTAINMENT (NEW YORK)  
INC., a New York corporation; RCI  
HOSPITALITY HOLDINGS, INC.  
fka RICK’S CABARETI  
NTERNATIONAL, INC., a Texas  
corporation; RCI MANAGEMENT  
SERVICES, a Texas corporation;  
ERIC LANGAN, an individual; ED  
ANAKAR, an individual; DOE  
MANAGERS 1-3; and DOES 4-10,  
inclusive,

Defendants.

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**COMES NOW** plaintiff Kayla Urena (“Plaintiff” and “Ms. Urena”) by and through undersigned counsel, and submits Plaintiff’s Notice of Acceptance of defendants Peregrine Enterprises, Inc. dba Rick’s Cabaret New York, RCI Entertainment (New York), Inc., RCI Hospitality Holdings, Inc. fka Rick’s Cabaret International, Inc., RCI Management Services, Eric Langan, and Ed Anakar’s (collectively, “Defendants”) Offer of Judgment pursuant to Federal Rule of Civil Procedure 68 as follows:

1. Plaintiff Kayla Urena commenced this collective action on February 22, 2022. *See* Dkt. 1.

2. On April 3, 2023, Defendants served plaintiff Kayla Urena with an Offer of Judgment pursuant to Federal Rule of Civil Procedure 68 in the amount of \$26,412.82 to Plaintiff as full compensation for all fees and costs incurred in this action. A true and correct copy of Plaintiff Kayla Urena's Offer of Judgment is attached hereto as **Exhibit 1**.

3. This acceptance of offer of judgment extinguishes only Ms. Urena's claims in this action. However, twenty-one other opt-in plaintiffs (Angela Brown, Giselle Luza, Lauren Farano, Marley Blangiardo, Rebecca Branson, Zuleyka Bula, Maria Cardenas, Coral Ann Hall, Raina Bigham, Elena Malysheva, Teresa Leja, Lisa Sdrigotti, Leslie Tejeda, Kayle Rodriguez, Yana Toyber, Kianna Francis, Maryanny Manan, Janice Valdez, Tracie Middleton, Gabriela Chan, and Ashley Venecia) continue to prosecute their claims before this Court.

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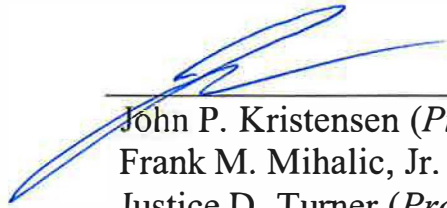
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written notice of her acceptance of the offer via the Court's CM/ECF electronic filing system to Defendants' attorneys of record.

Respectfully Submitted,

Dated: 4/13/2023

**CARPENTER & ZUCKERMAN**

A handwritten signature in blue ink, appearing to be "John P. Kristensen", is written over a horizontal line.

John P. Kristensen (*Pro Hac Vice*)  
Frank M. Mihalic, Jr. (*Pro Hac Vice*)  
Justice D. Turner (*Pro Hac Vice*)

***Attorneys for Plaintiff***

**CERTIFICATE OF SERVICE**

I certify that on Thursday, April 13, 2023 a true and correct copy of the attached  
**PLAINTIFF KAYLA URENA'S NOTICE OF ACCEPTANCE OF DEFENDANTS'  
OFFER OF JUDGMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 68**  
was served via CM/ECF upon the following parties pursuant to Rule 5 of the Federal Rules of  
Civil Procedure:

Jeffrey A. Kimmel  
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***Counsel for Defendants***

*/s/ John P. Kristensen*

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John P. Kristensen